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*Attorneys for Plaintiff Pearson Education, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

PEARSON EDUCATION, INC.,	)	
	)	
Plaintiff,	)	Civ. Action No. 2:21-cv-16866-SDW-ESK
	)	
v.	)	
	)	
CHEGG, INC.,	)	<b>DECLARATION OF</b>
	)	<b>MATTHEW J. OPPENHEIM</b>
	)	<b>IN SUPPORT OF PRO HAC VICE</b>
Defendant.	)	<b>ADMISSION</b>

I, Matthew J. Oppenheim, Esq., hereby declare as follows:

1. I am a partner at the law firm of Oppenheim + Zebrak, LLP, having offices located at 4530 Wisconsin Avenue, NW, 5th Floor, Washington, DC 20016.

2. I submit this declaration in support of the request of Plaintiff, Pearson Education, Inc., for the entry of an Order permitting me to appear and participate in the instant matter pursuant to L. Civ. R. 101.1 of the Rules of the United States District Court for the District of New Jersey.

3. I am an attorney-at-law and a member in good standing of the Bar of the United States Supreme Court (Admitted: May 21, 2001). The office and address of the official maintaining the roll of members for the Supreme Court of the United States is: One First Street, NE, Washington, DC 20543.

4. I am also a member in good standing of the Bar of the United States Court of Appeals for the Sixth Circuit (Admitted: March 24, 2017). The office and address of the official maintaining the roll of members for the United States Court of Appeals for the Sixth Circuit is: 100 East Fifth Street Cincinnati, OH 45202.

5. I am also a member in good standing of the Bar of the United States Court of Appeals for the Seventh Circuit (Admitted: March 7, 2003). The office and address of the official maintaining the roll of members for the United States Court of Appeals for the Seventh Circuit is: 219 S. Dearborn Street, Chicago, IL 60604.

6. I am also a member in good standing of the Bar of the United States Court of Appeals for the Eighth Circuit (Admitted: December 23, 2003). The office and address of the official maintaining the roll of members for the United States Court of Appeals for the Eighth Circuit is: 111 South 10th Street, Room 24.329, St. Louis, MO 63102.

7. I am also a member in good standing of the Bar of the United States Court of Appeals for the Ninth Circuit (Admitted: September 13, 2001). The office and address of the

official maintaining the roll of members for the United States Court of Appeals for the Ninth Circuit is: 95 7th Street, San Francisco, CA 94103.

8. I am also a member in good standing of the Bar of the United States District Court for the Northern District of Illinois (Admitted: August 23, 2011). The office and address of the official maintaining the roll of members for the Bar of the United States District Court for the Northern District of Illinois is: 219 S. Dearborn Street, Chicago, IL 60604.

9. I am also a member in good standing of the Bar of the United States District Court for the District of Maryland (Admitted: April 1, 1994). The office and address of the official maintaining the roll of members for the United States District Court for the District of Maryland is: 6500 Cherrywood Lane, Greenbelt, MD 20770.

10. I am also a member in good standing of the Bar of the United States District Court for the Eastern District of Michigan (Admitted: June 13, 2011). The office and address of the official maintaining the roll of members for the United States District Court for the Eastern District of Michigan is: 231 W. Lafayette Boulevard, Detroit, MI 48226.

11. I am also a member in good standing of the Bar of the United States District Court for the Southern District of New York (Admitted: October 17, 2006). The office and address of the official maintaining the roll of members for the United States District Court for the Southern District of New York is: 500 Pearl Street, New York, NY 10007.

12. I am also a member in good standing of the Bar of the United States District Court for the Eastern District of Wisconsin (Admitted: October 24, 2004). The office and address of the official maintaining the roll of members for the United States District Court for the Eastern District of Wisconsin is: 517 E. Wisconsin Avenue, Room 362, Milwaukee, WI 53202.

13. I am also a member in good standing of the Maryland State Bar (Admitted: December 15, 1993). The office and address of the official maintaining the roll of members for the Maryland State Bar is: 361 Rowe Boulevard, Annapolis, MD 21401.

14. I am also a member in good standing of the Bar of the District of Columbia (Admitted: October 14, 1994). The office and address of the official maintaining the roll of members for the Bar of the District of Columbia is: 901 4th Street, NW, Washington, DC 20001.

15. I am also a member in good standing of the New York State Bar (Admitted: April 20, 2005). The office and address of the official maintaining the roll of members for the New York State Bar is: 1 Elk Street, Albany, NY 12207.

16. I am not currently, nor have I ever been, suspended or disbarred by any court. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

17. Pursuant to L. CIV. R. 101.1(c), I have designated Karen A. Confoy, Esq., of the law firm of Fox Rothschild, LLP, having offices located at 997 Lenox Drive, Building 3, Lawrenceville, NJ 08648, who is a member in good standing of the Bar of this Court and who maintains an office within this district, as the attorney of record with whom the Court and opposing counsel may readily communicate regarding the conduct of this case.

18. Pursuant to L. CIV. R. 101.1(c)(5), and if admitted to practice before this Court *pro hac vice*, I will abide by the Rules of Disciplinary Procedures of this Court, and I will submit to the jurisdiction of this Court for any disciplinary issues. The law firm of Fox Rothschild LLP has agreed to work as New Jersey local counsel with my firm in connection with this action.

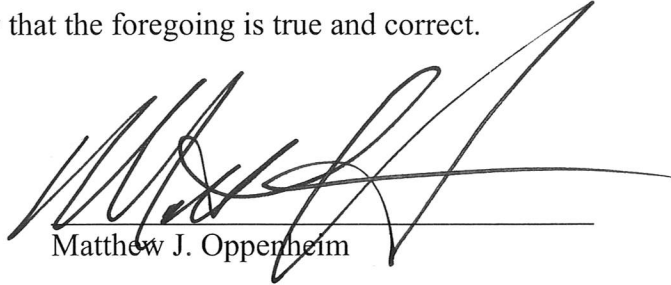
19. If admitted to practice before this Court *pro hac vice*, I agree not to take any fee in any tort case in excess of New Jersey Court Rule 1:21-7, governing contingent fees.

20. If admitted to practice before this Court *pro hac vice*, I agree to make all payments required under L. Civ. R. 101.1.

21. I am familiar with the Local Civil Rules of the United States District Court for the District of New Jersey, and I will abide by those Rules.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 28, 2021  
Washington, DC



Matthew J. Oppenheim